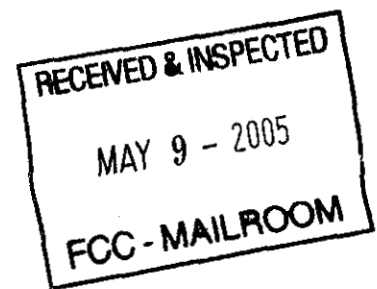


7 May 2005



Ms. Marlene Dortch, Secretary  
Federal Communications Commission  
Office of Secretary,  
9300 East Hampton Drive,  
Capitol Heights, MD 20743

DOCKET FILE COPY ORIGINAL

RE: COMMENTS and COUNTERPROPSAL,  
MB Docket No. 05-131.

Dear Ms. Dortch:

Enclosed is an original and four (4) copies of my  
COMMENTS and COUNTERPROPOSAL concerning MB Docket No. 05-131.

Respectfully submitted,

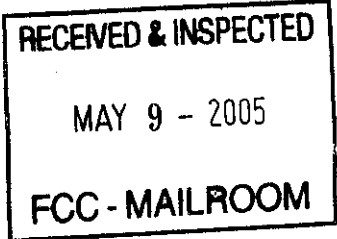
A handwritten signature in cursive script that reads "Michael R. Birdsill".

Michael R. Birdsill  
P.O. Box 1921,  
Chico, CA. 95927

No. of Copies rec'd  
List ABOVE

074

Before the  
Federal Communications Commission  
Washington, D.C. 20554



In the Matter of )  
Amendment of Section 73.202 (b) ) MB Docket No. 05-131  
FM Broadcast Stations ) RM-11208  
(Redding, California) ) RM-11209

TO: Assistant Chief, Audio Division  
Media Bureau.

COMMENTS and COUNTERPROPOSAL.

Michael R. Birdsill ("Birdsill"), hereby submits these  
COMMENTS and COUNTERPROPOSAL in the above-captioned Rulemaking  
Proceeding.

Birdsill proposes that FM Channel 221A be Allocated to  
Cottonwood, California as it's **First Local Station**, rather than  
the Fifth FM Station to Redding, California. Birdsill asserts  
that Cottonwood, California is a "Community" for Allotment  
purposes. Not only is Cottonwood a Census Defined Place with  
a Census 2000 population of 2,950 persons; Cottonwood has it's  
own Community Center, Community Library, Water District, Cemetery  
District, Union School District, Loins Club, Little League;  
as well as 32 Businesses that identify themselves with  
Cottonwood, i.e. "Cottonwood Auction Yard". (See EXHIBIT 1,  
attached).

Furthermore, the Commission had previously Allotted an  
AM Channel to Cottonwood, California. Station KTCD (AM), 1200  
KHz, was Authorized in 1986 (File No. BP-830502 AM). However,  
that AM Station was deleted in September 1992. Therefore, the

Allocation of FM Channel 221A to Cottonwood would be a First Local Station to that Community.

FM Channel 221A at Cottonwood can be Allotted at a site that is Fully Spaced to all other relevant FM Stations (40-23-45, 122-17-22), which is just 1.38 Kilometers Northwest of the Reference Coordinates for the community of Cottonwood, California (40-23-09, 122-16-47). (See EXHIBIT 2 for Spacing to relevant FM Stations).

If FM Channel 221A is Allotted to the Community of Cottonwood, California, Birdsill intends to file an Application for that FM Station; and if that Application is Granted, build the Station in a timely manner.

In compliance with Section 1.52 of the Commission's Rules, the statements and data contained in these COMMENTS and COUNTERPROPOSAL are accurate to the best of my knowledge.

DATE:

8 May 2005

SIGNATURE:

Michael R. Birdsill

Michael R. Birdsill  
P.O. Box 1921,  
Chico, CA. 95927



**EXHIBIT 2****Michael R. Birdsill****COMMENTS and COUNTERPROPOSAL****MB Docket NO. 05-131**

Spacing to relevant FM Channels for FM Channel 221A at Allotment Site for Cottonwood, CA. (40-23-45, 122-17-22).

CALL SIGN City of License	Channel Freq.(MHz)	Distance (km)	Required (km)
KKRO Redding, CA.	218A 91.5	57	31
KCHO Chico, CA.	219B	69	69
App. 950210 MA McCloud, CA.	220A 91.9	106	72
App. 960503 MG McCloud, CA.	220A 91.9	100	72
MB Docket No. 05-131 Redding. CA.	221A 92.1	21	115 (- 94)
KRED-FM Eureka, CA.	222C1 92.3	147	133
KLVB Red Bluff, CA.	274C2 102.7	30	15

**Certificate of Service.**

I, Michael R. Birdsill, hereby certify that a copy of the foregoing COMMENTS and COUNTERPROPOSAL, MB Docket 05-131, was sent this 8th day of May 2005, via first class U.S. Mail, postage prepaid, to the following:

Linda A. Davidson  
2134 Oak Street, Unit C,  
Santa Monica, CA 90405

Paul Barth  
P.O. Box 494430  
Redding, CA. 96049

SIGNATURE: Michael R. Birdsill  
Michael R. Birdsill  
P.O. Box 1921,  
Chico, CA. 95927